KOBRE & KIM

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United States Magistrate Judge
Dated: 7-8-2022

The conference is adjourned to September 7,

2022, at 10:00 am."

July 6, 2022

BY ECF

The Honorable Valerie Figueredo
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: The Federal Republic of Nigeria v. VR Advisory Services, Ltd., et al., Case No. 1:21-MC-00007 (S.D.N.Y.)

Dear Judge Figueredo:

We are counsel to respondents VR Advisory Services, Ltd., VR Advisory Services (USA) LLC, VR Global Onshore Fund, L.P., VR Argentina Recovery Onshore Fund II, L.P., Jeffrey Johnson, and Ashok Raju (together, the "VR Respondents") in connection with the above-captioned application (the "Application") by the Federal Republic of Nigeria ("Nigeria") under 28 U.S.C. § 1782 ("Section 1782"). We write pursuant to the Court's Individual Practices in Civil Cases Rule I(e) to respectfully request a second adjournment of the in-person conference scheduled for July 12, 2022. *See* ECF 34.

As the Court is aware, *see* ECF 32, Nigeria's Application seeks discovery from the same parties as it is currently obtaining discovery from in another Section 1782 application in this District. *The Federal Republic of Nigeria, et al. v. VR Advisory Services, Ltd., et al.*, 1:20-mc-00209 (S.D.N.Y.) (Engelmayer, J.) ("First Application"). In light of the ongoing discovery process in the First Application, and without prejudice to their respective positions on the merits of this Application, the parties agree that a status conference regarding this Application is not necessary at this time.

This is the second request for an adjournment of this appearance, as the first request was granted. *See* ECF 32. Nigeria consents to this adjournment request. The parties propose that the July 12, 2022 appearance be adjourned to any time on August 31 or September 1 or 2, 2022. If the Court is not available on any of those dates, the parties request the appearance be adjourned to September 7, 8, or 9, 2022.

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Respectfully submitted,

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